| 1  | William L. Buus (SBN 180059)   |  |  |  |
|----|--|--|--|--|
| 2  | William L. Buus (SBN 180059)  wbuus@buuslaw.com  BUUS LAW GROUP APC  |  |  |  |
| 3  | 3 Pointe Drive, Suite 110<br>Brea, CA 92821  |  |  |  |
| 4  | Telephone: (949) 825-6140<br>Facsimile: (949) 825-6141   |  |  |  |
| 5  | Attorneys for Plaintiffs WINGSAIL HOLDINGS, LLC and YUNFEI "KRISTY" BAI  |  |  |  |
| 6  | YUNFEI "KRISTY" BAI  |  |  |  |
| 7  |  |  |  |  |
| 8  | UNITED STATES DISTRICT COURT   |  |  |  |
| 9  | CENTRAL DISTRICT OF CALIFORNIA   |  |  |  |
| 10 |  |  |  |  |
| 11 | WINGSAIL HOLDINGS, LLC, a Case No.: 8:23-CV-02398-JWH-DFM  |  |  |  |
| 12 | Washington Corporation, and YUNFEI (Washington Corporation, and Washington Corporation, and Washington Corporation, and Washington Corporation, and Washington Corporation (Washington Corporation) (Washin |  |  |  |
| 13 | Plaintiffs,  |  |  |  |
| 14 | vs.  |  |  |  |
| 15 | ANDREW POLSKY, an individual, and SEFED, a California Corporation, and   |  |  |  |
| 16 | DOES 1 through 10,   |  |  |  |
| 17 | Defendants.  |  |  |  |
| 18 | ,  |  |  |  |
| 19 | Pursuant to the Order/Referral to ADR entered on December 23, 2024 (ECF  |  |  |  |
| 20 | No. 61), the parties hereby submit this joint report regarding the progress of   |  |  |  |
| 21 | settlement discussions in the above-captioned case.  |  |  |  |
| 22 | On December 15, 2025, all parties and their respective counsel participated  |  |  |  |
| 23 | in a remote mediation session (by Zoom) with William J. Caplan, Esq. of Judicate   |  |  |  |
| 24 | West.  |  |  |  |
| 25 | Plaintiffs' Statement: The case did not settle at mediation and it did not   |  |  |  |
| 26 | appear to Plaintiffs that progress had been made or that a settlement would be   |  |  |  |
| 27 | reached. Nevertheless, Plaintiffs are willing to continue discussing settlement.   |  |  |  |
| 28 | Defendants' Statement: The case did not settle at mediation, though  |  |  |  |

1

| 1  | progress was made. Defendant Andrew Polsky believes that further settlement             |                 |   |  |
|--|---|-----------------|---|--|
| 2  | discussions may likely lead to resolution of some or all claims at issue. Thus, Mr.     |                 |   |  |
| 3  | Polsky welcomes any order requiring the parties to further mediate the case in          |                 |   |  |
| 4  | person through the Court's ADR process.   |                 |   |  |
| 5  |   |                 | Respectfully submitted,                           |  |
| 6  | Dated:  | January 6, 2026 | BUUS LAW GROUP APC                                |  |
| 7  |   |                 | /s/ William L. Buus                               |  |
| 8  |   |                 |   |  |
| 9  |   |                 | By: William L. Buus<br>Counsel for Plaintiffs     |  |
| 10   |   |                 | WINGSAIL HOLDINGS, LLC and YUNFEI "KRISTY" BAI    |  |
| 11   | Dated:  | January 6, 2026 | RUTAN & TUCKER, LLP                               |  |
| 12   |   |                 | / / A1 · 1 · C · A · 1                            |  |
| 13   |   |                 | /s/ Alejandro S. Angulo                           |  |
| 14   |   |                 | By: Alejandro S. Angulo<br>Counsel for Defendants |  |
| 15   |   |                 | ANDREW POLSKY and SEFED                           |  |
| 16   | L.R. 5-4.3.4(a)(2) CERTIFICATION  |                 |   |  |
| 17   | Pursuant to Local Rule 5-4.3.4(a)(2), the undersigned certifies that all other          |                 |   |  |
| 18   | signatories listed, and on whose behalf the filing is submitted, concur in the filing's |                 |   |  |
| 19   | content and have authorized the filing.   |                 |   |  |
| 20   |   |                 |   |  |
|  |   |                 | / / H/:-11:                                       |  |
| 21   |   |                 | /s/ William L. Buus                               |  |
|  |   |                 | /s/ William L. Buus<br>William L. Buus            |  |
| 21   |   |                 |   |  |
| 21<br>22   |   |                 |   |  |
| 21<br>22<br>23   |   |                 |   |  |
| <ul><li>21</li><li>22</li><li>23</li><li>24</li></ul>            |   |                 |   |  |
| <ul><li>21</li><li>22</li><li>23</li><li>24</li><li>25</li></ul> |   |                 |   |  |
| 21<br>22<br>23<br>24<br>25<br>26                                 |   |                 |   |  |

1 PROOF OF SERVICE 2 I am employed in the County of Orange, State of California. I am over the 3 age of eighteen (18) years and am not a party to the within action. My business 4 address is that of 3 Pointe Drive, Suite 110, Brea, California 92821. I hereby certify that on January 6, 2026, I electronically filed the foregoing 5 JOINT REPORT RE ADR with the Clerk of the Court using ECF which will send 6 7 notification and a copy of such filing to the following persons: 8 Alejandro S. Angulo, Esq. aangulo@rutan.com Joelle Leib, Esq. 9 ileib@<u>rutan.com</u> 10 18575 Jamboree Road, 9<sup>th</sup> Floor Irvine, California 92612 11 Tel.: 714-641-5100 12 Fax: 714-546-9035 Attorneys for Defendants ANDREW POLSKY and SEFED 13 14 Executed on January 6, 2026, at Brea, California. 15 I declare under penalty of perjury under the laws of the United States of 16 America that the foregoing is true and correct. 17 18 /s/ William L. Buus 19 20 21 22 23 24 25 26 27 28